

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Fiduciary Network, LLC,	:	
	:	
Plaintiff,	:	Civil Case No. 19-cv-00379 (GHW)
	:	
v.	:	<u>ORAL ARGUMENT REQUESTED</u>
	:	
Mark P. Hurley,	:	
	:	
Defendant.	:	
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NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, pursuant to Rule 56 of the Federal Rules of Civil Procedure, and upon the accompanying Memorandum of Law, the Declaration of Neil A. Steiner and the exhibits attached thereto, and Plaintiff's Statement of Undisputed Material Facts pursuant to Local Civil Rule 56.1, Plaintiff Fiduciary Network, LLC will move this Court, before the Honorable Gregory H. Woods, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., New York, NY 10007, on a date and time to be determined by the Court, for an Order granting summary judgment (i) on Plaintiff's First Claim for Relief declaring that Hurley is not entitled to indemnification for attorneys' fees and expenses allegedly incurred in connection with the internal investigation, (ii) as to liability on Plaintiffs' Second Claim for Relief, and (iii) granting permanent injunctive relief on Plaintiff's Third Claim for Relief, and for such other and further relief as this Court may deem just and proper.

Dated: New York, New York
June 18, 2020

DECHERT LLP

By: /s/ Neil A. Steiner
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